

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: GEORGE D. MCCONNELL, aka : **Chapter 13**
George Douglas McConnell, aka : **Case No. 18-15806-pmm**
George McConnell, :
Debtor :

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **GEORGE D. MCCONNELL**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.

3. Denied. Debtor has paid \$37,525 to date. Debtor missed three months of work due to two knee surgeries and may receive short term disability for the time missed, but has not to date. Debtor has resumed employment and wage attachment payments to the Trustee in an amount that will reduce the Plan payment arrears over time. Debtor requests a continuance of the hearing on the Motion to Dismiss until an anticipated tax refund will allow him to completely cure the Plan payment default.

WHEREFORE, Debtor(s) **GEORGE D. MCCONNELL** respectfully pray(s) this Honorable Court for an Order that the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ J. Zac Christman
J. ZAC CHRISTMAN, Esquire
Attorneys for Debtor(s)
556 Main Street, Suite 12
Stroudsburg, PA 18360
(570) 234-3960; fax (570) 234-3975
zac@fisherchristman.com